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BY ECF

February 27, 2012

The Honorable Kiyo A. Matsumoto
United States District Judge
United States Courthouse
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: United States v. Russo, et al.
Indictment No. 11-CR-30 (KAM)
Defendant Michael Castellano

Dear Judge Matsumoto:

I represent defendant Michael Castellano (hereinafter “defendant”) in the above-entitled criminal action. Defendant’s sentencing is currently scheduled for March 14, 2012 at 2:00 p.m.

I am writing this letter to respectfully request, with the consent of the Government, a two-week adjournment of defendant’s sentencing. This is our second request for an adjournment. We had made a previous adjournment request on December 29, 2011, since we were awaiting a report from an expert concerning a serious health issue confronting defendant’s 5-year-old son, which the Court granted. We have received the expert’s report. However, the parties need additional time to discuss a sentencing issue that has arisen due to the Addendum to the Pre-sentence report that was issued by the Probation Department on January 27, 2012. I have discussed this request with AUSA Allon Lifshitz, the Assistant handling the case, and he consents to our request.

Accordingly, I respectfully request that defendant’s sentencing be adjourned for two weeks, so that we can finalize this issue prior to sentencing.

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Thank you.

Respectfully submitted,



Steven R. Kartagener

cc: AUSA Allon Lifshitz